

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RUBEN QUIROZ-TREJO,)
Petitioner,)
v.) CASE No.: 3:15-cv-1020
DAVID RIVERA,) SENIOR JUDGE WILLIAM J. HAYNES, JR.
Respondent.)

PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE REPLY/TRAVERSE

Pursuant to M.D. TENN. L.R. 7.01(b) and 28 U.S.C. §§ 2243 and 2248, Petitioner respectfully requests a ten (10)-day extension of time to file the Reply/Traverse to the Return filed by Respondent (ECF No. 9). This Court previously permitted leave to submit a Reply/Traverse on or before December 18, 2015. (ECF No. 11).

As good cause for this Motion, Petitioner, through counsel, states that additional time is needed as a result of several unanticipated, time-sensitive client emergencies that arose during the 14-day period Reply/Traverse counsel requested and that required immediate attention to prevent irreparable harm to clients. These included the imminent deportation of several detained clients or individuals on whose cases Plaintiff's counsel consults, as well as the arrest and need for emergency consultation with another of counsel's clients.

These unexpected, pressing demands, combined with the fact that Petitioner's counsel was able to work only limited hours for two days during the week of December 14–18 due to illness, have left Petitioner needing additional time to prepare and submit his filing.

This request is not made for the purpose of undue delay, but rather, to afford Petitioner's counsel a meaningful opportunity to respond to the Government's position. Given the short duration of the requested extension and the fact that Petitioner will remain in no-bond detention during this period, no Government interest will be prejudiced by allowing him the requested extension.

Accordingly, Petitioner respectfully requests that the deadline for submitting his Reply/Traverse be extended by ten (10) days to **December 28, 2015**.

Date: December 18, 2015

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on today's date, I served a true and correct copy of the foregoing *Petitioner's Motion for Extension of Time to File Reply/Traverse* on the following individuals via this Court's CM/ECF system:

Joseph D. Hardy, Jr
Department of Justice-Office of Immigration Litigation
PO Box 868
Ben Franklin Station
Washington, DC 20008

Dated: December 18, 2015

By: /s R. Andrew Free, TN BPRN 30513
R. Andrew Free